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15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 NATHANIEL WOODS, JR.,

20 Plaintiff,

21 v.

22 BAYER HEALTHCARE, Biological Products
23 Division, a for profit business entity,

24 Defendant.

CASE NO. C-05-02871 JSW

26 STIPULATION AND ~~PROPOSED~~ ORDER
27 PROTECTING PARTIES'
28 CONFIDENTIAL INFORMATION AND
ALLEGED TRADE SCRETS

TRIAL DATE: None Assigned

Hon. Jeffrey S. White

1 WHEREAS, on December 8, 2003, *Jones, et al. v. Bayer* was filed as a putative class
2 action, with the named plaintiffs of Lavon Jones, Nathaniel Woods, Haben Berhane, and Dwight
3 Dove;

4 WHEREAS, on November 22, 2004, the putative class action allegations were removed
5 from the Jones et al. complaint when the plaintiffs filed their 2nd Amended Complaint;

6 WHEREAS, on June 2, 2005, defendant Bayer HealthCare along with plaintiffs Lavon
7 Jones, Nathaniel Woods, Haben Berhane, and Dwight Dove entered into a Stipulation Protecting
8 Parties' Confidential Information and Alleged Trade Secrets, pursuant to Rule 26(c)(7);

9 WHEREAS, on June 21, 2005, the Court "ORDERED that the Stipulation be adopted in its
10 entirety...";

11 WHEREAS, Bayer's motion to sever was granted in the *Jones, et al.* matter by this Court
12 on June 23, 2005. Plaintiff Woods filed his individual Complaint on July 14, 2005, based largely
13 on the same individual allegations as the *Jones, et al.* suit. While no longer one suit, the individual
14 actions continue to be deemed related;

15 WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively
16 adverse, they agree through their respective counsel and stipulate as follows:

- 17 1. Nathaniel Woods and Bayer HealthCare do hereby re-adopt the Stipulation
18 Protecting Parties' Confidential Information and Alleged Trade Secrets. A true and
19 accurate copy of the Stipulation and Order is attached hereto as Exhibit A.
20 2. Both parties to this suit retain their duties and responsibilities as stipulated and
21 ordered in the Stipulation Protecting Parties' Confidential Information and Alleged
22 Trade Secrets.

23
24 **IT IS SO STIPULATED.**

25 DATED: March 16, 2006

MOORE & MOORE

26
27 By: s/Howard Moore, Jr.
HOWARD MOORE, JR.
28 Attorneys for Plaintiff
NATHANIEL WOODS

1 DATED: March 16, 2006

By: s/Charles Stephen Ralston
CHARLES STEPHEN RALSTON
Attorney for Plaintiff
NATHANIEL WOODS

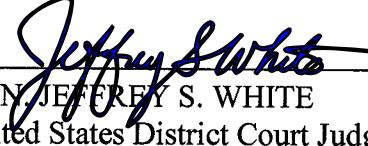
2
3 DATED: March 16, 2006

4 THE LOUDERBACK LAW FIRM

5 By: s/Jerome Schreibstein
JEROME SCHREIBSTEIN
JAMES T. CONLEY
Attorneys for Defendant
BAYER HEALTHCARE

6
7
8 IT IS SO ORDERED.

9
10 DATED: March 17,
11 _____, 2006

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14 
15 HON JEFFREY S. WHITE
United States District Court Judge
16 Northern District of California

17 #37092